

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of)

Inquiry into Policies and Programs)
to Assure Universal Telephone Service)
in a Competitive Market Environment)

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RM 8388

Comments of John Staurulakis, Inc.

John Staurulakis, Inc. (JSI), by its attorney, hereby files these comments in response to the petition for a notice of inquiry and en banc hearing filed by MFS Communications Company, Inc. (MFS).¹ JSI is a telecommunications consulting firm providing cost consulting and access-related management and regulatory services to over 150 independent telephone companies. As part of these services, JSI is keenly aware of the issues related to Universal Service and the policies that have derived the current financial mechanisms to assure that its client-companies are able to meet these national objectives. As such, JSI is an interested party in this proceeding.

Clearly, JSI does not agree with much that MFS purports as fact within its petition. However, while JSI agrees with MFS that "... assurance of universal service" must be addressed as competition develops, JSI does not agree that Universal Service alone "is undoubtedly the single most significant public policy

¹ See Petition of MFS Communications Company, Inc. for a Notice of Inquiry and En Banc Hearing, filed November 1, 1993 (MFS Petition). The MFS Petition was given public notice and was assigned RM 8388 by the Federal Communications Commission (Commission) on November 16, 1993. See Public Notice, Report No. 1986, released November 16, 1993.

issue that the [Commission] will have to address as the market for local telephone service becomes increasingly competitive...."² Rather, JSI submits that Universal Service is one of the critical issues that must be addressed; Universal Service cannot be view alone or in a vacuum.

Accordingly, JSI submits that the Commission's resources and energies would be better utilized by considering the MFS Petition in the context of the recently announced "broad" review of the current Universal Service Fund.³ JSI believes that it would be imprudent not to conduct a comprehensive review of the interrelated areas raised by competition. These interrelated areas include, but are not limited to, the definition of Universal Service, Universal Service funding, separations reform and access charge reform.

When the current Universal Service policies and mechanisms were initially developed, the Commission's decisions recognized the interrelationship of these areas. While MFS has focused on one aspect of Universal Service, MFS has not demonstrated nor has it presented any reasonable argument to suggest that consideration of all of these inter-related areas be divorced from each other today. This overall review is especially important in the context of the more rural service territories that the JSI client-companies serve,

² MFS Petition at 1.

³ See In the Matter Of Amendment of Part 36 of The Commission's Rules And Establishment of a Joint Board, Notice of Proposed Rulemaking, CC Docket No. 80-286, FCC 93-435, released September 14, 1993 at para. 2; Recommended Decision, FCC 93J-3, released December 10, 1993 at para. 3 (USF Rulemaking).


territories that may only see competition in their higher volume business markets.

WHEREFORE, JSI requests that the MFS Petition be considered in the context of the broad review announced in the USF Rulemaking. The MFS Petition should be considered, in conjunction with all other related Universal Service areas, including, but not limited to, the definition of Universal Service, Universal Service funding, separations reform and access charge reform. JSI believes that the treatment of the MFS Petition in this manner will assure the prudent use of available time and resources as well as recognize the interrelationship between all of these areas.

Respectfully submitted,

John Staurulakis, Inc.

By:


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Certificate of Service

I, Thomas J. Moorman, do hereby certify that on this 16th day of December, 1993 a copy of the foregoing "Comments of John Staurulakis, Inc." in RM 8388 were mailed, first class postage prepaid to the individuals listed below.

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